

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TRUSTEES OF THE BRICKLAYERS)
AND ALLIED CRAFTSMEN LOCAL 56)
FRINGE BENEFIT FUND,)
Plaintiffs,) Case No. 08-cv-1616
v.) Judge James B. Zagel
AL'S MASONRY CONTRACTING,)
INC., an Illinois corporation; AL'S MAINTENANCE,)
INC., a dissolved Illinois corporation; ALFONSO)
GUZMAN, SR., individually; ANDREA GUZMAN,)
Individually; and MARIA SABAT a/k/a MARY SABAT)
a/k/a MARIA SORIA, individually,)
Defendant.)

**PLAINTIFF'S MOTION FOR
LEAVE TO FILE THIRD PARTY SUBPOENAS AND SUBPOENAS FOR
DEPOSITIONS**

Plaintiffs, TRUSTEES OF THE BRICKLAYERS AND ALLIED CRAFTSMEN LOCAL 56 FRINGE BENEFIT FUND, by and through their attorneys, Shane Luedke and Donald Schwartz of Arnold and Kadjan, move this Court for leave to file subpoenas and subpoenas for depositions.

1. All parties in the case are on notice of the present case.
 - a. Defendants Al's Masonry, Alfonso Guzman, Sr., and Andrea Guzman have been personally served with the summons in the present case. See attached docket report.
 - b. Defendant Al's Masonry's evidence of notice is the fact that their attorney, Scott Schreiber, has filed notice with court and has appeared in court on behalf of Al's Maintenance at the preliminary injunction

hearing held 4/3/2008. See attached docket report.

- c. The evidence of Defendant Mary Sabat's notice of this action is the fact that she appeared in court on her own behalf on the noticed hearing for Temporary Restraining Order held 3/27/2008.
2. This leave is sought in connection with the Temporary Restraining Order and Preliminary Injunction granted by this court preventing the Defendants from working as bricklayer contractors.
3. Plaintiffs have evidence that Defendants may be working as a bricklayer contractor in violation of the court order.
4. The subpoenas and subpoenas for depositions will be issued to third parties with information related to the information Plaintiffs have that Defendants are working as bricklayer contractors.

Respectfully submitted,

s/ Shane Luedke
Shane Luedke

Donald D. Schwartz
Shane Luedke
ARNOLD & KADJAN
19 West Jackson Boulevard
Chicago, Illinois 60604
(312) 236-0415
ATTORNEYS FOR PLAINTIFFS